

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHARLES B. HILL, JR.,)	
)	
Plaintiff,)	Case No. 08 C 1917
)	
v.)	Judge Shadur
)	
COUNTY OF COOK, et al.,)	
)	
Defendants.)	

**AGREED MOTION FOR LEAVE TO FILE PLAINTIFF'S
SECOND AMENDED COMPLAINT**

The Plaintiff, CHARLES B. HILL, JR., by and through his attorney, Thomas J. Canna, hereby moves this court for leave to file Plaintiff's Second Amended Complaint, and in support thereof state as follows:

1. On April 3, 2008, Charles B. Hill, Jr. filed a Complaint in this matter as a *pro se* plaintiff.
2. On June 9, 2008, while still acting *pro se*, Plaintiff filed an Amended Complaint.
3. On June 16, 2008, this Court issued a Memorandum Order appointing Thomas J. Canna as counsel for Plaintiff. In that Order, this Court stated that "appointed counsel will most likely file a new pleading to replace the Amended Complaint recently tendered by Hill..."
4. In order to properly pursue his claims, Plaintiff requires the opportunity to file a Second Amended Complaint.
5. Plaintiff's counsel has already prepared a Second Amended Complaint. However, Plaintiff's counsel is waiting for authority to visit Plaintiff so that the pleading may be reviewed before filing with this Court.
6. Defendants who have already appeared in this matter have agreed to this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order providing as follows:

A. Plaintiff is granted leave to file a Second Amended Complaint on or before August 26, 2008.

B. Defendants who have already appeared in this matter have until September 15, 2008, to file an answer to the Second Amended Complaint or to otherwise plead.

Respectfully submitted,

CHARLES B. HILL, JR.,

By: s/ Thomas J. Canna
Plaintiff's Attorneys

Thomas J. Canna - ARDC #6180108
CANNA AND CANNA, LTD.
10703 West 159th Street
Orland Park, Illinois 60467
(708) 349-2772